

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**ANGEL DAVID MORALES  
VALLELLANES,  
Plaintiff,**

**v.**

**JOHN POTTER, UNITED STATES  
POSTMASTER GENERAL, ET ALS.,  
Defendants.**

**CIVIL NO. 97-2459 (GAG)(CVR)**

**DAMAGES BASED ON  
RETALIATION AND  
DISCRIMINATION;  
PROHIBITED PERSONNEL  
PRACTICES; UNFAIR LABOR  
PRACTICES; BREACH OF  
COLLECTIVE BARGAINING  
AGREEMENT**

**TRIAL BY JURY IS HEREBY  
REQUESTED**

**PLAINTIFF'S PROPOSED VERDICT FORM**

**TO THE HONORABLE COURT:**

**COMES NOW** the defendant, and through the undersigned attorneys, respectfully submit the following Proposed Verdict Form.

**VERDICT FORM**

The jury must unanimously agree on the answer to the following question:

1. Has plaintiff proven by a preponderance of the evidence that he was intentionally discriminated against by defendant on the basis of sex or gender?

YES \_\_\_\_\_

NO \_\_\_\_\_

2. Has plaintiff proven by a preponderance of the evidence that he was subjected to intentional discriminatory retaliation by defendant?

YES \_\_\_\_\_

NO \_\_\_\_\_

If your answer to the questions above is "YES", then go to the following question. If your answer to the questions above is "NO", you should skip the following question and the Foreperson should sign this form.

Under the law as given to you in these instructions, state the amount, if any, for compensatory damages; back pay; front pay; plaintiff should be awarded from defendant with respect to his damages.

Compensatory damages      AMOUNT:    \$ \_\_\_\_\_      NONE: \_\_\_\_\_

Back Pay      AMOUNT:    \$ \_\_\_\_\_      NONE: \_\_\_\_\_

Front Pay      AMOUNT:    \$ \_\_\_\_\_      NONE: \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature  
Foreperson

**I HEREBY CERTIFY** that on September 5, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

**RESPECTFULLY SUBMITTED** in San Juan, Puerto Rico, this 5<sup>th</sup> day of December, 2007.

S/MIGUEL E. MIRANDA-GUTIERREZ  
**MIGUEL E. MIRANDA-GUTIERREZ, ESQ.**  
ATTORNEY FOR PLAINTIFF  
PO Box 192271  
San Juan, Puerto Rico 00919-2271  
TEL: (787) 282-0022  
FAX: (787) 753-7655